

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

BRANDY CHAMBERLAIN,

Plaintiff,

Case No. 14-11608

vs.

Hon. Robert H. Cleland

MICHAEL KARSON,

Defendants.

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STIPULATED PROTECTIVE ORDER

At a session of said Court
held in the City of Detroit
County of Wayne, on April 8, 2015

PRESENT: Honorable ROBERT H. CLELAND
United States District Court Judge

The above matter having come before this Court pursuant to the stipulation of the parties; Plaintiff's counsel having sought certain documents from Defendant and Harper Woods and good cause having been shown to the Court being otherwise informed in the premises, now therefore:

IT IS HEREBY ORDERED AND ADJUDGED that the following procedures shall govern the production of documents requested by Plaintiff's counsel:

1. Defendant will produce the Insurance Policy in effect on February 19, 2014 for Harper Woods and any of its officers and the Personnel File of Officer Karson (with personal contact, ssn and date of birth information redacted). The records produced by Defendant shall be subject to the provisions of this Protective Order.

2. Plaintiff and her attorneys shall not reveal such information, nor show the documents, or reveal the information contained in such documents, reviewed in and/or provided from the documents to anyone except for the purpose of discovery and preparation for and the use of all pretrial and trial proceedings of this cause, including Plaintiff's expert witness(es). Said information and/or documents shall be deemed to be confidential and shall be treated as confidential by anyone who obtains the information or sees the documents.

3. Said information and/or documents shall be returned to the Defendant's counsel at the conclusion of this case and said documents shall not be copied, published, or in any way disseminated except for use in this case.

4. Plaintiff and her attorneys, prior to revealing the information or showing such documents or revealing the information contained therein to persons other than employees or agents of the attorneys, shall provide such persons with a copy of this Protective Order and shall place such persons on notice that such persons are to return the documents to Plaintiff and her attorneys at the conclusion of this litigation.

5. Nothing in this Protective Order shall prevent the parties filing a Motion for Modification of the Protective Order, either through stipulation, or good cause shown, and this Court retains continuing jurisdiction to enforce this Order.

S/Robert H. Cleland
UNITED STATES DISTRICT COURT JUDGE

Approved as to form and content:

/s/Paul W. Broschay
PAUL W. BROSCHEY (P36267)
Attorney for Plaintiff

/s/Peter W. Peacock
PETER W. PEACOCK (P37201)
Attorney for Defendant